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UNITED STATES BANKRUPTCY COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re)	Case Nos. 19-30088 DM (Lead Case)
)	19-30089 DM
PG&E CORPORATION)	Chapter 11
-and-)	Jointly Administered
PACIFIC GAS AND ELECTRIC)	
COMPANY,)	REQUEST FOR JUDICIAL NOTICE AND
Debtors.)	ADMISSION INTO EVIDENCE IN
<input type="checkbox"/> Affects PG&E Corporation)	SUPPORT OF CITY OF SANTA CLARA
<input checked="" type="checkbox"/> Affects Pacific Gas and Electric Company)	DBA SILICON VALLEY POWER'S
<input type="checkbox"/> Affects both Debtors.)	MOTION TO COMPEL ASSUMPTION OR
)	REJECTION OF EXECUTORY CONTRACT
)	CONCERNING THE GRIZZLY
)	DEVELOPMENT AND MOKELUMNE
* All papers shall be filed in the Lead Case)	SETTLEMENT AGREEMENT

No. 19-30088 DM

) Date: September 14, 2021
) Time: 10:00 a.m. (Pacific Time)
) Courtroom: 17
)
) **Response Deadline: August 31, 2021,**
) **4:00 p.m. (Pacific Time)**
)
) Place: **Telephone/Video Appearances**
) **Only**
) United States Bankruptcy Court
) 450 Golden Gate Ave., 16th Floor
) San Francisco, CA 94102
) Judge: Hon. Dennis Montali
)

The City of Santa Clara dba Silicon Valley Power ("Santa Clara"), in support of its *Motion to Compel Assumption or Rejection of Executory Contract concerning the Grizzly Development and Mokelumne Settlement Agreement* ("Motion") and pursuant to Federal Rules of Evidence Rule 201, as made applicable in bankruptcy court by Federal Rules of Evidence Rule 1101 and to this case by Federal Rules of Bankruptcy Procedure Rule 9017, hereby requests the Court to take judicial notice of and for admission into evidence of the following facts, documents and orders:

1. Attached as **Exhibit 1** is a true and correct copy of the Grizzly Development and Mokelumne Settlement Agreement between Pacific Gas and Electric Company and the City of Santa Clara, entered into on March 8, 1990 ("GDMSA"), and most recently filed by PG&E at the Federal Energy Regulatory Commission ("FERC") as a stand-alone agreement in FERC Docket No. ER17-1752-000, effective August 1, 2017.

2. Attached as **Exhibit 2** is a true and correct copy of the Grizzly Operation And Maintenance Agreement by and between Pacific Gas and Electric Company and the City of Santa Clara dated June 5, 2002, as amended.

3. Attached as **Exhibit 3** is a true and correct copy of the Letter Agreement Regarding Bucks Creek Hydroelectric Project Relicensing Cost Sharing Pursuant to Grizzly Development and Mokelumne Settlement Agreement (1990) dated September 6, 2013 by and between Pacific Gas and Electric Company and the City of Santa Clara.

4. Attached as **Exhibit 4** is a true and correct copy of the referenced pages of the

PG&E/Santa Clara Final License Application for Bucks Creek Hydroelectric Project, FERC Project No. 619 (FERC filed Dec. 12, 2016) at Volume I, Exhibit A, Pages A-1, A-13 - A-20 (FERC filed Dec. 12, 2016) and the complete application can be found at <http://www.bucksrelicensing.com/Public/default.aspx>.

5. Attached as **Exhibit 5** is a true and correct copy of a FERC Order in which FERC notes that PG&E and Santa Clara agree that the first reverter date is in November 2027 filed in *Public Utilities With Existing Contracts in the California Independent System Operator Corporation Region*, 112 FERC ¶61,007 (2005).

6. Attached as **Exhibit 6** is a true and correct copy of this Court's order in PG&E's first chapter 11 case (Case No. 01-30923 DM, filed April 6, 2001; "PG&E I") confirming the plan and assuming all executory contracts: *Order Confirming Plan of Reorganization under Chapter 11 of the Bankruptcy Code for Pacific Gas and Electric Company proposed by Pacific Gas and Electric Company, PG&E Corporation and the Official Committee of Unsecured Creditors Dated July 31, 2003, as modified*, entered December 22, 2003, Dkt. 14272, Case No. 01-30923.

7. Attached as **Exhibit 7** is a true and correct copy of PG&E December 11, 2018 Supplement to the California Public Utilities Commission regarding Electric Incident Report Nos. EI181108A and EI181108B, which can also be found at <http://dig.abclocal.go.com/kggo/PDF/121118-pge-camp-fire-letter-to-cpuc.pdf>.

8. Attached as **Exhibit 8** is a true and correct copy of PG&E Response to Request for Information, *United States of America v. Pacific Gas and Electric Company*, Case 3:14-cr-00175-WHA, Docket 1078 (N.D.Cal., filed July 31, 2019).

9. Attached collectively as **Exhibit 9** are true and correct copies of PG&E's Transmittal Letter dated January 8, 2020 to the Federal Energy Regulatory Commission in FERC Docket No. ER20-757-000, submitting for filing and acceptance Amendment Number Seven to the Grizzly Development and Mokelumne Settlement Agreement by and between Pacific Gas and Electric Company and City of Santa Clara.

10. Attached as **Exhibit 10** is a true and correct copy of the Federal Energy Regulatory Commission's Letter Order in FERC Docket No. ER20-757-000, accepting Amendment Number

1 Seven to the Grizzly Development and Mokelumne Settlement Agreement by and between Pacific
2 Gas and Electric Company and City of Santa Clara, dated March 3, 2020.

3 11. Attached as **Exhibit 11** is a true and correct copy of Order Modifying Conditions of
4 Probation, *United States of America v. Pacific Gas and Electric Company*, Case 3:14-cr-00175-WHA,
5 Docket 1186 (N.D.Cal., filed April 29, 2020).

6 12. The pleadings and papers filed in these bankruptcy cases identified in the Motion and
7 related papers.

8 DATED: July ~~3~~³⁰, 2021.

RESPECTFULLY SUBMITTED,

9 BOUTIN JONES INC.

10 By: /s/ Thomas G. Mouzes
11 Thomas G. Mouzes
12 Mark Gorton
Robert D. Swanson

13 -and-

14 Lisa S. Gast
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18 CITY OF SANTA CLARA

19 Attorneys for Creditor and Party-in-Interest,
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